IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SUZETTE ROBINSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	**No.**
	)	
CITY OF EVANSTON, WALTER BOBKIEWICZ, GRANT FARRAR, and JENNIFER LIN,	)	**JURY DEMANDED**
	)	
Defendants.	)	

COMPLAINT

Plaintiff, Suzette Robinson, by her attorneys, brings this Complaint against Defendants the City of Evanston (the "City"), Walter Bobkiewicz, Grant Farrar, and Jennifer Lin, for discrimination on the basis of race, harassment and racially hostile work environment, and for retaliation, in violation of 42 U.S.C. § 1983 and the Illinois Human Rights Act. In support of her claims, Robinson states as follows:

Background

1. Suzette Robinson was the Director of Public Works for the City of Evanston from March 2010 until August 2015. At the time, she was one of only three African-American employees at the Department Director level reporting directly to Walter Bobkiewicz, the City Manager. After Robinson expressed her concern about Bobkiewicz's treatment of the City's African-American community and employees, Bobkiewicz began a campaign of harassment and retaliation against Robinson designed to drum her out of her job. Defendants W. Grant Farrar, City

Attorney, and Jennifer Lin, the City's Human Resources Division Manager, participated in the retaliation by taking action in an effort to force Robinson to withdraw her complaints about Bobkiewicz's conduct.

2. Robinson brings this action for compensatory and punitive damages, and other relief caused by the City's and the individual Defendants' discriminatory and retaliatory conduct.

Parties

3. Robinson is an individual residing in Washington, D.C. Robinson was employed by the City of Evanston from April 2006 to August 2015. From March 2010 to August 2015, Robinson was the Director of Public Works for the City of Evanston.

4. The City of Evanston is a municipal corporation in Cook County, Illinois. At all relevant times, the City was an employer as that term is defined in the Illinois Human Rights Act, 775 ILCS 5/2-101(B)(1)(a).

5. Walter Bobkiewicz is an individual residing in Cook County, Illinois. Bobkiewicz is the City Manager for the City of Evanston. At all relevant times, Bobkiewicz was a "person" within the meaning of the Illinois Human Rights Act, 775 ILCS 5/6-101. Pursuant to the City Code of Evanston, the City Manager has the duty to "appoint and remove all directors of departments." All employees perform their duties under the direction of the City Manager or under any other superior to whom the employee is assigned. The City Manager also has "the power to discharge any employee." Evanston City Code § 1-8-3(B).

6. W. Grant Farrar is an individual residing in Cook County, Illinois. Farrar is the Corporation Counsel/City Attorney for the City of Evanston. At all relevant times, Farrar was a "person" within the meaning of the Illinois Human Rights Act, 775 ILCS 5/6-101.

7. Jennifer Lin is an individual residing in Cook County, Illinois. Lin is the Human Resources Division Manager for the City of Evanston. At all relevant times, Lin was a "person" within the meaning of the Illinois Human Rights Act, 775 ILCS 5/6-101.

Jurisdiction and Venue

8. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 over the claims alleged herein arising under 42 U.S.C. § 1983. This Court has jurisdiction pursuant to 28 U.S.C. § 1332, based on diversity of citizenship, and 28 U.S.C. § 1367(a), based on supplemental jurisdiction, over the claims alleged herein arising under the Illinois Human Rights Act.

9. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because the civil rights and statutory violations alleged herein were committed within the District.

10. Robinson timely filed Charges of Discrimination against the City, Bobkiewicz, Farrar, and Lin with the Illinois Department of Human Rights ("IDHR") on April 30, 2015 and September 16, 2015. A copy of Robinson's Charges are attached as Exhibit A. On March 1, 2016, April 12, 2016, April 26, 2016 and April 27, 2016, the IDHR sent Robinson Notices that her Charges were dismissed

and advised that she could commence a civil action within ninety days after receipt of the IDHR Notices. A copy of the IDHR Notices are attached hereto as Exhibit B.

Facts

11. Robinson began employment with the City of Evanston in April 2006 as the Superintendent of Streets and Sanitation. In May 2009, she became the Acting Director of Public Works. In March 2010, she became the Director of Public Works, reporting directly to Bobkiewicz.

12. Robinson is African-American. At the time she became Director of Public Works, there were approximately sixteen employees reporting directly to Bobkiewicz. Of those sixteen employees reporting to Bobkiewicz, ten were Department Directors. Three of the Department Directors were women; two of those women (including Robinson) were African-American, one was Caucasian. One of the male Department Directors was African-American, the others were Caucasian.

13. As Director of Public Works, Robinson was responsible for the administration and operation of five divisions: Operations and Maintenance, Parks and Forestry, Engineering and Infrastructure, Fleet Services, and Administration. Over 100 employees worked in these five divisions.

Robinson Expresses Concern about Bobkiewicz's Treatment of African-Americans

14. Bobkiewicz has a history of mistreatment of the City's African-American community and the City's African-American employees. For example,

Bobkiewicz has made several derogatory comments about the City's black elected officials.

15. On more than one occasion, Bobkiewicz told Robinson that two white male Department Directors told him that she had received her job only as a result of affirmative action and that she was not qualified.

16. Also on more than one occasion, Bobkiewicz used the phrase, "we are going to make sure we have the right people in the right seats on the bus." Black City employees explained to Bobkiewicz that the phrase has negative connotation to blacks and have asked him to use a different metaphor.

17. In or around May 2014, Robinson was asked, along with the other Department Directors to participate in a performance evaluation of Bobkiewicz. In that evaluation, Robinson was critical of and expressed concern about Bobkiewicz's treatment of the City's African-American community and African-American employees.

18. In an executive session of the City Council in August 2014, Bobkiewicz learned about Robinson's comments about him in the performance evaluation. Bobkiewicz later cornered Robinson into revealing that she was responsible for these comments about his treatment of African-Americans.

Bobkiewicz Begins a Campaign of Harassment and Retaliation against Robinson

19. On November 7, 2014, Bobkiewicz verbally reprimanded Robinson and made disparaging comments about her in front of two of her assistant directors and about two-thirds of the Public Works employee group that reported to her. Later in

a one-to-one meeting, Bobkiewicz told Robinson that she was of no value to the City Council.

20. On a number of occasions in the fall of 2014, Bobkiewicz alluded to at least two of Robinson's subordinates that she would be seeking employment outside the City as soon as her daughter graduated from high school and that they were potential candidates for Robinson's replacement. Robinson had no such plans and Bobkiewicz's comments were designed solely to undermine her authority with the employees who reported to her.

21. Robinson filed an internal "healthy work environment" complaint against Bobkiewicz on November 17, 2014 arising from this conduct. That complaint was investigated by Marty Lyons, Assistant City Manager, who reports directly to Bobkiewicz.

22. Bobkiewicz was advised not to speak directly to Robinson about her healthy work environment complaint, but in another one-to-one meeting, Bobkiewicz confronted Robinson about the complaint and made it clear he was not happy about it.

23. After Robinson filed the healthy work environment complaint, Bobkiewicz reassigned some of Robinson's duties to other members of his staff who did not have the skill set to perform those duties. Bobkiewicz also attempted to bar Robinson from attending a meeting with one of the City's two African-American aldermen.

24. After Robinson filed the healthy work environment complaint, Bobkiewicz required Deputy City Manager Erika Storlie to attend his one-to-one meetings with Robinson; he did not require Storlie to attend his one-to-one meetings with other Department Directors.

25. Lyons concluded, in a memorandum dated December 2, 2014, that three of the five healthy work environment complaints Robinson lodged against Bobkiewicz were sustained. In a memorandum dated January 14, 2015, the City's Mayor, Elizabeth Tisdahl, issued a written reprimand to Bobkiewicz.

26. In January 2015, Bobkiewicz convened a meeting with Department Directors specifically to solicit negative comments about one of the City's two African-American aldermen. At that meeting, Robinson specifically asked if she could comment on issues with other non-African-American aldermen and Bobkiewicz said she could not.

27. Also in January 2015, despite previous requests from African-American employees, Bobkiewicz again used the phrase, "we are going to make sure we have the right people in the right seats on the bus," at a staff meeting.

Farrar and Lin Seek to Fabricate Complaints against Robinson

28. Despite the written reprimand, Robinson felt her concerns regarding Bobkiewicz's discriminatory and retaliatory conduct had not been fully resolved. As a result, on March 4, 2015, she sent a demand letter, through her attorney, to Farrar, in his capacity as the City Attorney. The letter specifically described

Robinson's concerns about Bobkiewicz's disparate treatment of African-American employees.

29. Farrar invited Robinson to make a detailed settlement demand to the City thereafter. She did so in a letter dated March 30, 2015. In that letter, Robinson advised that if her demands were not met, she would file a charge of discrimination against the City.

30. The City responded to Robinson's settlement demand in a letter dated April 14, 2015, in which Farrar made clear that the City would not resolve her claims unless she left her employment with the City.

31. Farrar also made direct threats in the letter that if Robinson filed a charge of discrimination, the City would try the case in the press, which would be "an unfortunate result." Farrar also referred in his letter to "many" healthy work environment complaints that had allegedly been filed against Robinson since 2008.

32. Robinson had no intention of leaving her employment with the City and she advised Farrar on April 23, 2015, through her attorney, that she would proceed with filing her charge of discrimination.

33. On April 30, 2015, Robinson filed her first Charge of Discrimination with the Illinois Department of Human Rights ("IDHR"), alleging that the City had retaliated against her and discriminated against her because of her race.

34. Farrar's references to the allegedly "many" healthy work environment complaints in his April 14, 2015 letter could only have been referring to incidents from 2008, 2010 and 2012. With respect to those incidents: Robinson had been

advised that her apology for conduct in 2008 had been accepted and that memoranda relating to that complaint would be removed from her personnel file and shredded; Robinson had been advised that complaints lodged against her in 2010 had been determined to be unfounded (in fact, she was promoted to Director of Public Works the following month); and communication issues with an employee in Robinson's department raised in 2012 were not raised as a healthy work environment complaint and were resolved to the satisfaction of all concerned.

35. After Robinson advised that she would proceed with filing an IDHR Charge, and undoubtedly recognizing that Farrar's contention that Robinson had been the subject of "many" healthy work environment complaints was unsubstantiated, the City, Farrar, and Lin set out to fabricate healthy work environment complaints against her.

36. On information and belief, at Farrar's direction, Lin undertook to interview multiple employees to dig up dirt on Robinson. Lin's interviews were conducted between April 27 and May 5, 2015. Not one of the employees interviewed had approached Lin voluntarily to lodge complaints about Robinson. Rather, they were called in by Lin and interrogated. Many of those employees were observed leaving their interviews with Lin in tears. Lin reportedly dismissed as irrelevant any positive remarks made about Robinson in those interviews.

37. The City, Farrar, and Lin did not follow established City procedures for the investigation of healthy work environment complaints in connection with these alleged complaints against Robinson.

38. Lin documented her interviews in a memorandum to Assistant City Manager Lyons and Farrar dated May 8, 2015. Without the benefit of speaking to Robinson about any of the allegations allegedly made, Lin concluded that Robinson had created an unhealthy work environment. Furthermore, Lin concluded that this alleged unhealthy work environment was "immediate," even though the most recent specific incident described in Lin's memorandum was over 6 months old and some incidents were at least 8 years old.

39. Lin's memorandum was attached as Exhibit A to the City's Position Statement filed on July 10, 2015 in response to Robinson's IDHR Charge.

40. Contrary to established City policy and procedure, Robinson was never informed of the results or recommendations made with respect to these alleged healthy work environment complaints.

Bobkiewicz Effectively Demotes Robinson

41. On May 12, 2015, Bobkiewicz announced an examination of the Public Works and Utilities Departments that would lead to what he expected to be an elimination of both departments. The examination was conducted by two white males – Assistant City Manager Lyons and Rickey Voss.

42. In connection with that examination, Bobkiewicz changed Robinson's reporting structure so that she reported directly to Lyons, instead of Bobkiewicz.

43. At Bobkiewicz's direction, Lyons stripped Robinson of all decision-making authority and advised her direct reports to report to him. He attended all of her staff meetings. Lyons took over correspondence to the City Manager or

Aldermen that was previously assigned to Robinson, or assigned it to one of her white male assistant directors.

44. On information and belief, Lyons did not take similar action against Dave Stoneback, who was the Director of the Utilities Department, which was also allegedly under examination. Stoneback, a white male, had not previously complained about Bobkiewicz's conduct and had not filed a Charge of Discrimination against the City or Bobkiewicz with the IDHR.

45. Bobkiewicz also reassigned one of Robinson's divisions, Fleet Services, to another department.

46. Soon after he announced the "examination" of the Public Works and Utilities Departments, Bobkiewicz stated publicly that Stoneback would continue to lead water operations efforts after the evaluation of services, and may have expanded duties in the future.

47. At the same time, Bobkiewicz stated publicly that decisions relating to Robinson's continued employment with the City would be made after the evaluation of services was completed.

48. By taking these actions, the City and Bobkiewicz effectively demoted Robinson.

The City and Bobkiewicz Terminate Robinson's Employment

49. The examination of the Public Works and Utilities Departments was conducted by Lyons and Voss from approximately May through August 2015. Lyons characterized the examination as a "grass roots review process" designed to review

the organization and operations of the two departments. Despite Lyons's representation in a Memorandum dated August 27, 2015 and presented to the City Council that he had conducted meetings with the "entire staff" of the two departments and individual meetings with "directors, managers, and staff" of the departments, no one met with Robinson to discuss the organization or operation of the Public Works Department during this time.

50. On August 21, 2015, Lyons advised Robinson that her employment was terminated. He did not elaborate on the reasons for the termination.

51. That same day, Robinson received a letter from Bobkiewicz advising her that the City planned to combine the Public Works and Utilities Departments into one department, tentatively named the Public Works Agency.

52. At the time of Bobkiewicz's letter, however, the Public Works Agency had not yet been created. In fact, according to Lyons's August 27, 2015 Memorandum, designation and appointment of the Agency Director and Bureau Chiefs for this new agency would not be completed until mid-October 2015. Nevertheless, Bobkiewicz advised Robinson in his August 21 letter that her position would be eliminated from the City's budget for Fiscal Year 2016.

53. Bobkiewicz contended in his letter to Robinson that, "Over the past months, you indicated your voluntary desire to separate from your employment with the City." According to Bobkiewicz, that course of conduct, "represented [Robinson's] decision to remove [herself] from consideration for application or appointment to a position in the Public Works Agency." Consequently, Bobkiewicz

advised Robinson that, "In light of the City's position elimination and your voluntary decision to remove yourself from appointment to the Public Works Agency, the City has no choice but to terminate your employment, effective immediately."

54. Robinson had no desire to separate from her employment with the City of Evanston and had advised the City of that fact. To the contrary, the City made separation of her employment a condition of any proposed settlement of the Charge of Discrimination Robinson had filed with the IDHR in April. In fact, just one day before Robinson's termination, she had rejected a proposal from the City to accept severance payment in exchange for her resignation, even without a release or settlement of her Charge of Discrimination.

55. Prior to Bobkiewicz's letter of August 21, 2015, Robinson was not aware of any plans to create a Public Works Agency. Thus, Robinson could not have, and did not in fact, remove herself voluntarily from consideration for an appointment with the newly-created agency.

56. Robinson advised Bobkiewicz in a letter of August 21, 2015, that she would be honored and delighted to be considered for the director-equivalent position with the Public Works Agency. Bobkiewicz never responded to Robinson's letter.

57. The City gave the position of Director of the Public Works Agency to Dave Stoneback.

Count I
Against the City of Evanston
For Violation of 42 U.S.C. § 1983
Arising from Race Discrimination
In Violation of 42 U.S.C. § 1981

58. Robinson realleges paragraphs 1 through 57 as if fully set forth herein.

59. Section 1981 mandates that "[a]ll persons within the jurisdiction of the United States shall have the same right … to make and enforce contracts … as is enjoyed by white citizens." 42 U.S.C. § 1981(a).

60. Section 1983 mandates that "every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory … subjects, or causes to be subjected, any citizen of the United States … to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured." 42 U.S.C. § 1983.

61. At all relevant times, Robinson was qualified for and adequately performed her job for the City.

62. Bobkiewicz, as the City Manager, was the policymaking official with final policymaking authority for the appointment and removal of all directors and for the discharge of any employee of the City.

63. The City, through Bobkiewicz, removed Robinson from her position of Director of Public Works and terminated Robinson from her employment with the City because of her race, in violation of 42 U.S.C. § 1981(a). The City's removal of Robinson from her position of Director of Public Works and termination of Robinson

from her employment with the City deprived her of her rights secured by Section 1981, thereby violating 42 U.S.C. § 1983.

64. As a result of the City's conduct, Robinson has suffered financial, emotional, and other damages.

Count II
Against the City of Evanston
For Violation of 42 U.S.C. § 1983
Arising from Retaliation
In Violation of 42 U.S.C. § 1981

65. Robinson realleges paragraphs 1 through 64 as if fully set forth herein.

66. The City, through Bobkiewicz, terminated Robinson from her employment with the City in retaliation for her complaints of race discrimination, in violation of 42 U.S.C. § 1981(a). The City's removal of Robinson from her position of Director of Public Works and termination of Robinson from her employment with the City deprived her of her rights secured by Section 1981, thereby violating 42 U.S.C. § 1983.

67. As a result of the City's conduct, Robinson has suffered financial, emotional, and other damages.

Count III
Against Defendant Bobkiewicz
For Violation of 42 U.S.C. § 1983
Arising from Race Discrimination
In Violation of 42 U.S.C. § 1981

68. Robinson realleges paragraphs 1 through 67 as if fully set forth herein.

69. Acting under color of state law, Bobkiewicz harassed Robinson, effectively demoted her, and terminated her from her employment with the City

because of her race, in violation of 42 U.S.C. § 1981(a). Bobkiewicz's conduct deprived her of her rights secured by Section 1981, thereby violating 42 U.S.C. § 1983.

70. Bobkiewicz's conduct was intentional and was committed with malice or reckless indifference to Robinson's federally protected rights.

71. As a result of Bobkiewicz's conduct, Robinson has suffered financial, emotional, and other damages.

Count IV
Against Defendant Bobkiewicz
For Violation of 42 U.S.C. § 1983
Arising from Retaliation
In Violation of 42 U.S.C. § 1981

72. Robinson realleges paragraphs 1 through 71 as if fully set forth herein.

73. Acting under color of state law, Bobkiewicz harassed Robinson, effectively demoted her, and terminated her from her employment with the City in retaliation for her complaints of race discrimination, in violation of 42 U.S.C. § 1981(a). Bobkiewicz's conduct deprived her of her rights secured by Section 1981, thereby violating 42 U.S.C. § 1983.

74. Bobkiewicz's conduct was intentional and was committed with malice or reckless indifference to Robinson's federally protected rights.

75. As a result of Bobkiewicz's conduct, Robinson has suffered financial, emotional, and other damages.

Count V
Against Defendants Farrar and Lin
For Violation of 42 U.S.C. § 1983
Arising from Retaliation
In Violation of 42 U.S.C. § 1981

76. Robinson realleges paragraphs 1 through 75 as if fully set forth herein.

77. Acting under color of state law, Farrar and Lin fabricated healthy work environment complaints against Robinson in retaliation for her complaints of race discrimination, and in an effort to force her to withdraw her complaints of race discrimination, in violation of 42 U.S.C. § 1981(a). Farrar and Lin's conduct deprived Robinson of her rights secured by Section 1981, thereby violating 42 U.S.C. § 1983.

78. Farrar and Lin's conduct was intentional and was committed with malice or reckless indifference to Robinson's federally protected rights.

79. As a result of Farrar and Lin's conduct, Robinson has suffered financial, emotional, and other damages.

Count VI
Against Defendant City of Evanston
For Race Discrimination and Harassment
In Violation of the Illinois Human Rights Act

80. Robinson realleges paragraphs 1 through 79 as if fully set forth herein.

81. Through the conduct from November 2014 through April 2015 alleged above, the City subjected Robinson to race discrimination and a racially hostile work environment, in violation of the Illinois Human Rights Act, 775 ILCS 5/2-102(A).

82. As a result of the City's conduct, Robinson has suffered financial, emotional, and other damages.

Count VII
Against Defendant City of Evanston
For Retaliation
In Violation of the Illinois Human Rights Act

83. Robinson realleges paragraphs 1 through 82 as if fully set forth herein.

84. Through the conduct from November 2014 through April 2015 alleged above, the City retaliated against Robinson, in violation of the Illinois Human Rights Act, 775 ILCS 5/6-101.

85. As a result of the City's conduct, Robinson has suffered financial, emotional, and other damages.

Count VIII
Against Defendant Bobkiewicz
For Retaliation
In Violation of the Illinois Human Rights Act

86. Robinson realleges paragraphs 1 through 85 as if fully set forth herein.

87. Through the conduct alleged above, Bobkiewicz retaliated against Robinson by effectively demoting her and terminating her, in violation of the Illinois Human Rights Act, 775 ILCS 5/6-101.

88. As a result of Bobkiewicz's conduct, Robinson has suffered financial, emotional, and other damages.

Count IX
Against Defendants Farrar and Lin
For Retaliation
In Violation of the Illinois Human Rights Act

89. Robinson realleges paragraphs 1 through 88 as if fully set forth herein.

90. Through the conduct alleged above, Farrar and Lin retaliated against Robinson by fabricating healthy work environment complaints against Robinson in retaliation for her complaints of discrimination and retaliation, and in an effort to force her to withdraw her complaints of discrimination and retaliation, in violation of the Illinois Human Rights Act, 775 ILCS 5/6-101.

91. As a result of Farrar and Lin's conduct, Robinson has suffered financial, emotional, and other damages.

Prayer for Relief

WHEREFORE, Plaintiff Suzette Robinson respectfully requests that this Court:

(1) award her back-pay, front pay, and compensation for past and future monetary and non-monetary losses in an amount in excess of $75,000, the exact amount to be determined at trial;

(2) award her pre-judgment interest on all liquidated amounts due and owing;

(3) award her punitive damages to the extent allowed under the law;

(4) award her attorneys' fees and costs; and

(5) grant such other and further relief as may be just and proper.

Demand for Jury Trial

Robinson demands a jury trial on all claims.

SUZETTE ROBINSON

By: /s/ Cynthia H. Hyndman
One of her attorneys

Cynthia H. Hyndman
Andrew E. Cunningham
ROBINSON CURLEY & CLAYTON, P.C.
300 South Wacker Drive
Suite 1700
Chicago, Illinois 60606
(312) 663-3100 Telephone
(312) 663-0303 Facsimile
chyndman@robinsoncurley.com
acunningham@robinsoncurley.com

EXHIBIT A

CHARGE OF DISCRIMINATION	AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form. # Illinois Department of Human Rights and EEOC	☒ IDHR ☒ EEOC	

NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)
Ms. Suzette Robinson		[redacted]
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**DATE OF BIRTH**
[redacted]	Evanston, Illinois 60202	[redacted]

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)

NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code)
City of Evanston		847-448-4311
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**COUNTY**
2100 Ridge Avenue	Evanston, Illinois 60201	Cook

CAUSE OF DISCRIMINATION BASED ON:	DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)
Retaliation, race discrimination and harassment (hostile environment)	Early 2014 to present ☒ CONTINUING ACTION

S E E A T T A C H E D

Dept. of Human Rights
INTAKE UNIT
APR 30 2015
RECEIVED
By:

Page 1 of 4

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 30th DAY OF April, 2015.

NOTARY SIGNATURE

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

NOTARY STAMP

X SIGNATURE OF COMPLAINANT DATE 4-30-15

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief

EEO-5 FORM (Rev. 05/14-INT)

I. A. ISSUE/BASIS

Retaliation – November 7, 2014 until present

B. PRIMA FACIE ALLEGATIONS

1. I am the Public Works Director for the City of Evanston. I have held that position for the past five years.

2. I report directly to the City Manager, Walter Bobkiewicz.

3. During his tenure as City Manager, Mr. Bobkiewicz has a history of treating the three African-American department directors and the three female department directors less favorably than the six white male department directors.

4. In or around May 2014, I was asked, along with other department directors to participate in a performance evaluation of Mr. Bobkiewicz. In that evaluation, I was critical of and expressed concern about Mr. Bobkiewicz's treatment of the City's African-American community and the City's African-American employees. In an executive session of the City Council in August 2014, Mr. Bobkiewicz learned about my comments about him in the performance evaluation. Mr. Bobkiewicz later cornered me into revealing that I was responsible for these comments about his treatment of African-Americans.

5. Since that time, Mr. Bobkiewicz has undertaken a campaign of retaliation against me in an effort to undermine my authority and force me to resign my position.

6. On November 7, 2014, Mr. Bobkiewicz verbally reprimanded me and made disparaging comments about me in front of two of my assistant directors and about two-thirds of the Public Works employee group that reports to me. Later in our one-to-one meeting, he stated that I was of no value to the City Council.

7. On a number of occasions, Mr. Bobkiewicz has alluded to at least two of my subordinates that I would be seeking employment outside the City as soon as my daughter graduates from high school this June and that they were potential candidates for my replacement. I have no such plans and these comments were designed solely to undermine my authority with the employees who report to me.

8. I filed an internal "healthy work environment" complaint against Mr. Bobkiewicz on November 17, 2014. That complaint was investigated by Marty Lyons, the Assistant City Manager who reports directly to Mr. Bobkiewicz.

9. Mr. Bobkiewicz was advised not to speak to me about my complaint, but in a one-to-one meeting with Mr. Bobkiewicz, he confronted me about the complaint and made it clear he was not happy about it.

10. Mr. Bobkiewicz has reassigned some of my duties to members of his staff, even though those employees do not have the skill set to perform those duties.

11. As recently as March 2015, Mr. Bobkiewicz attempted to bar me from a meeting with one of two of the City's African-American aldermen. After the alderman asked for an explanation in writing as to why I would not be attending, Mr. Bobkiewicz relented and allowed me to attend the meeting.

12. Mr. Bobkiewicz has now required Deputy City Manager Erika Storlie to attend the one-to-one meetings between Mr. Bobkiewicz and me. Mr. Bobkiewicz does not require Ms. Storlie to attend his one-to-one meetings with other Department Directors.

II. A. ISSUE/BASIS

Race discrimination and harassment/hostile work environment – Early 2014 until present

B. PRIMA FACIE ALLEGATIONS

1. Mr. Bobkiewicz has a history of mistreatment of the City's African-American community and the City's African-American employees. For example, Mr. Bobkiewicz has made several derogatory comments about the City's black elected officials.

2. In early 2014, Mr. Bobkiewicz told me that two white male Department Directors told him that I received my job only as a result of affirmative action and that I was not qualified. In August 2014, Mr. Bobkiewicz made derogatory comments about my abilities in a meeting with another Director and two junior staff members.

3. Most recently, in January 2015, Mr. Bobkiewicz convened a meeting with

Department Directors specifically to solicit negative comments about one of the City's two African-American aldermen. At that meeting, I specifically asked if I could comment on issues with other non-African-American aldermen and Mr. Bobkiewicz said I could not.

4. On more than one occasion, Mr. Bobkiewicz has used the phrase, "we are going to make sure we have the right people in the right seats on the bus." Black staff members have explained to Mr. Bobkiewicz that the phrase has negative connotation to blacks and have asked him to use a different metaphor. Despite these requests, Mr. Bobkiewicz has continued to use the phrase, as recently as in a staff meeting in January 2015.

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form. # AGENCY ☒ IDHR ☐ EEOC	CHARGE NUMBER

Illinois Department of Human Rights and EEOC

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NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code)
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STREET ADDRESS	**CITY, STATE, ZIP CODE**	**COUNTY**
2100 Ridge Avenue	Evanston, Illinois 60201	Cook

CAUSE OF DISCRIMINATION BASED ON:	DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)
Retaliation	May 12, 2015 to August 21, 2015 ☐ CONTINUING ACTION

S E E A T T A C H E D

Dept. of Human Rights
SWITCHBOARD
SEP 16 2015
RECEIVED
By:

Page 1 of 5

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 16th DAY OF September, ____.

Blair M. Henderson
NOTARY SIGNATURE

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

NOTARY STAMP

x Suzette Robinson 9-16-15
SIGNATURE OF COMPLAINANT **DATE**

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief

I. A. ISSUE/BASIS

Retaliation – May 12, 2015 to August 21, 2015

B. PRIMA FACIE ALLEGATIONS

1. I served as the Public Works Director for the City of Evanston (the "City") from March 2010 until August 21, 2015. From May 2009 to March 2010, I was the Acting Director of Public Works.

2. Until May 2015, I reported directly to the City Manager, Walter Bobkiewicz.

3. In August 2014, I criticized Mr. Bobkiewicz's treatment of the City's African-American community and the City's African-American employees.

4. I filed an internal "healthy work environment" complaint against Mr. Bobkiewicz in November 2014, raising those same concerns.

5. On April 30, 2015, I filed a Charge of Discrimination with the Illinois Department of Human Rights ("IDHR"), alleging that the City had retaliated against me and discriminated against me because of my race, in connection with Mr. Bobkiewicz's conduct towards me. That Charge was assigned Charge Number 2015 CF 2974, and remains pending with the IDHR.

6. On May 12, 2015, Mr. Bobkiewicz announced an examination of the Public Works and Utilities Departments that would lead to what he expected to be an elimination of both departments. The examination was conducted by two white males – Assistant City Manager Martin Lyons and Rickey Voss. I had complained to Mr. Bobkiewicz in the past about Mr. Lyons's and Mr. Voss's treatment of me.

7. In connection with that examination, Mr. Bobkiewicz changed my reporting structure so that I reported directly to Mr. Lyons, instead of Mr. Bobkiewicz.

8. At Mr. Bobkiewicz's direction, Mr. Lyons stripped me of all decision-making authority and advised my direct reports to report to him. He attended all of my staff meetings. Mr. Lyons took over correspondence to the City Manager or Aldermen that was previously assigned to me, or assigned it to one of my white male assistant directors.

9. On information and belief, Mr. Lyons did not take similar action against Dave Stoneback, who was the Director of the Utilities Department, which

was also allegedly under examination. Mr. Stoneback had not previously complained about Mr. Bobkiewicz's conduct and had not filed a Charge of Discrimination against the City or Mr. Bobkiewicz with the IDHR.

10. Mr. Bobkiewicz also reassigned one of my divisions, Fleet Services, to another department.

11. Soon after he announced the "examination" of the Public Works and Utilities Departments, Mr. Bobkiewicz stated publicly that Dave Stoneback, the Director of the Utilities Department, would continue to lead water operations efforts after the evaluation of services, and may have expanded duties in the future.

12. At the same time, Mr. Bobkiewicz stated publicly that decisions relating to my continued employment with the City would be made after the evaluation of services was completed.

13. By taking these actions, Mr. Bobkiewicz effectively demoted me.

14. Mr. Bobkiewicz's conduct was in retaliation for the complaints I made about him and in retaliation for my filing Charge of Discrimination Number 2015 CF 2974 with the IDHR.

II. A. ISSUE/BASIS

Retaliation – August 21, 2015

B. PRIMA FACIE ALLEGATIONS

1. I served as the Public Works Director for the City of Evanston (the "City") from March 2010 until August 21, 2015. From May 2009 to March 2010, I was the Acting Director of Public Works.

2. Until May 2015, I reported directly to the City Manager, Walter Bobkiewicz. Thereafter, I reported to Assistant City Manager, Martin Lyons.

3. In August 2014, I criticized Mr. Bobkiewicz's treatment of the City's African-American community and the City's African-American employees.

4. I filed an internal "healthy work environment" complaint against Mr. Bobkiewicz in November 2014, raising those same concerns.

5. On April 30, 2015, I filed a Charge of Discrimination with the Illinois Department of Human Rights ("IDHR"), alleging that the City had retaliated against me and discriminated against me because of my race, in connection with Mr. Bobkiewicz's conduct towards me. That Charge was assigned Charge Number 2015 CF 2974, and remains pending with the IDHR.

6. On August 21, 2015, Martin Lyons, Assistant City Manager, advised me that my employment was terminated. He did not elaborate on the reasons for the termination.

7. That same day, I received a letter from Mr. Bobkiewicz advising me that the City planned to combine the Public Works and Utilities Departments into one department.

8. As part of that reorganization, Mr. Bobkiewicz advised me that my position would be eliminated from the City's budget for Fiscal Year 2016.

9. Mr. Bobkiewicz contended in his letter that, "Over the past months, [I] had indicated [my] voluntary desire to separate from [my] employment with the City." According to Mr. Bobkiewicz, that course of conduct, "represented [my] decision to remove [myself] from consideration for application or appointment to a position in the Public Works Agency."

10. Mr. Bobkiewicz advised that, "In light of the City's position elimination and your voluntary decision to remove yourself from appointment to the Public Works Agency, the City has no choice but to terminate your employment, effective immediately."

11. I had no desire to separate from my employment with the City and had advised the City of that fact. To the contrary, the City made separation of my employment a condition of any proposed settlement of the Charge of Discrimination I had filed with the IDHR. On information and belief, Mr. Bobkiewicz was aware, through his attorney, that I had no desire to separate from my employment with the City.

12. In fact, just one day before my termination, I had rejected a proposal from the City to accept severance payment in exchange for my resignation, even without a release or settlement of my Charge of Discrimination.

13. Prior to Mr. Bobkiewicz's letter of August 21, 2015, I was not aware of any plans to create a Public Works Agency. Thus, I could not have, and did not in fact, remove myself voluntarily from consideration for an appointment with the newly-created agency.

14. I advised Mr. Bobkiewicz in a letter of August 21, 2015, that I would be honored and delighted to be considered for the director-equivalent position with the Public Works Agency. Mr. Bobkiewicz has not responded to my letter.

15. Mr. Bobkiewicz's termination of my employment was in retaliation for the complaints I made about him and in retaliation for my filing Charge of Discrimination Number 2015 CF 2974 with the IDHR.

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form. # AGENCY ☒ IDHR ☐ EEOC	CHARGE NUMBER

Illinois Department of Human Rights and EEOC

NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)
Ms. Suzette Robinson		[redacted]
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**DATE OF BIRTH**
[redacted]	Evanston, Illinois 60202	[redacted]

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)

NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code)
W. Grant Farrar		847-448-4311
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**COUNTY**
2100 Ridge Avenue	Evanston, Illinois 60201	Cook

CAUSE OF DISCRIMINATION BASED ON:	DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)
Retaliation	April 21, 2015 to August 21, 2015 ☐ CONTINUING ACTION

S E E A T T A C H E D

Dept. of Human Rights
SWITCHBOARD
SEP 16 2015
RECEIVED
By:

Page 1 of 3

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 16th DAY OF September, 2015.

Blair M. Henderson
NOTARY SIGNATURE

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

NOTARY STAMP

x Suzette Robinson 9-16-15
SIGNATURE OF COMPLAINANT **DATE**

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief

EEO-5 FORM (Rev. 05/14-INT)

I. A. ISSUE/BASIS

Retaliation – April 21, 2015 to August 21, 2015

B. PRIMA FACIE ALLEGATIONS

1. I served as the Public Works Director for the City of Evanston (the "City") from March 2010 until August 21, 2015. From May 2009 to March 2010, I was the Acting Director of Public Works.

2. Until May 2015, I reported directly to the City Manager, Walter Bobkiewicz.

3. In August 2014, I criticized Mr. Bobkiewicz's treatment of the City's African-American community and the City's African-American employees.

4. I filed an internal "healthy work environment" complaint against Mr. Bobkiewicz in November 2014, raising those same concerns.

5. Because my concerns had not been resolved, my attorney sent a demand letter to the City through its corporation counsel, W. Grant Farrar on March 4, 2015.

6. Mr. Farrar invited me to make a detailed settlement demand to the City thereafter. I did so in a letter from my attorney on March 30, 2015. In that letter, I made it clear that if my demands were not met, I would file a charge of discrimination.

7. The City responded to my settlement demand through a letter from Mr. Farrar, making clear that I would have to leave my employment with the City in order to resolve my claims.

8. Mr. Farrar's letter also made direct threats that if I filed a charge of discrimination, the City would try the case in the press and that would be "an unfortunate result" for me. Mr. Farrar intimated in his letter that "many" healthy work environment complaints had been filed against me since 2008.

9. My attorney advised Mr. Farrar that I had no intention of leaving my employment with the City and that I would proceed with filing my charge of discrimination.

10. On April 30, 2015, I filed a Charge of Discrimination with the Illinois Department of Human Rights ("IDHR"), alleging that the City had retaliated against me and discriminated against me because of my race, in

connection with Mr. Bobkiewicz's conduct towards me. That Charge was assigned Charge Number 2015 CF 2974, and remains pending with the IDHR.

11. From at least the time I advised the City on March 30, 2015 that I planned to file a charge of discrimination, Mr. Farrar has engaged in efforts to retaliate against me.

12. Mr. Farrar and Jennifer Lin, the City's HR Division Manager, first set out to fabricate healthy work environment complaints against me to substantiate the allegations in Mr. Farrar's letter of April 14, 2015.

13. On information and belief, at Mr. Farrar's direction, Ms. Lin undertook to interview multiple employees to dig up dirt on me. Not one of these employees had approached Ms. Lin voluntarily to lodge complaints about me. Rather, they were called in by Ms. Lin and interrogated. Many of those employees were observed leaving their interviews with Ms. Lin in tears. Ms. Lin reportedly dismissed as irrelevant any positive remarks made about me in those interviews.

14. Mr. Farrar and Ms. Lin did not follow established City procedures for the investigation of healthy work environment complaints in connection with these alleged complaints against me.

15. Ms. Lin documented her interviews in a memorandum to Assistant City Manager Martin Lyons and Mr. Farrar dated May 8, 2015. Without the benefit of speaking to me about any of the allegations allegedly made during her interviews, Ms. Lin concluded that I had created an unhealthy work environment. Furthermore, Ms. Lin concluded that this alleged unhealthy work environment was "immediate," even though the most recent specific incident described was over 6 months old and some incidents were at least 8 years old.

16. Contrary to established City policy and procedure, I was never informed of the results or recommendations made with respect to these alleged healthy work environment complaints.

17. Mr. Farrar directed Ms. Lin to conduct these interviews in retaliation for my complaints against Mr. Bobkiewicz, for my stated intention of filing a charge of discrimination, and in retaliation for my filing Charge of Discrimination Number 2015 CF 2974 with the IDHR. In fact, the City submitted Ms. Lin's memorandum in response to my charge of discrimination in an effort to force me to withdraw that charge.

STATE OF ILLINOIS
ILLINOIS DEPARTMENT OF HUMAN RIGHTS

CHICAGO OFFICE
DEPARTMENT OF HUMAN RIGHTS
100 W RANDOLPH ST., SUITE 10-100
CHICAGO, ILLINOIS 60601
(312) 814-6200
(866) 740-3953 (TTY)

SPRINGFIELD OFFICE
DEPARTMENT OF HUMAN RIGHTS
222 S. COLLEGE ST., ROOM 101
SPRINGFIELD, ILLINOIS, 62704
(217) 785-5100
(866) 740-3953 (TTY)

CHARGE NO: _____

CHARGE OF DISCRMINIATION

COMPLAINANT

Name Suzette Robinson
Addre[redacted]
City, State ZIP Evanston, IL 60202
[redacted]

I believe that I have been personally aggrieved by a civil rights violation committed on

(date/s of harm): April 21, 2015 to August 21, 2015 **, by:**

RESPONDENT

Name W. Grant Farrar
Address 2100 Ridge Avenue
County Cook
City, State ZIP Evanston, IL 60201
Telephone Number 847-448-4311

Dept. of Human Rights
SWITCHBOARD
SEP 16 2015
RECEIVED
By:

SEE ATTACHED

I, Suzette Robinson **on oath or affirmation state that I am Complainant herein, that I have read the foregoing charge and know the contents thereof, and that the same is true and correct to the best of my knowledge.**

9-16-15
Complainant's Signature and Date

Subscribed and Sworn to

Before me this 16th **day**

of September, 2015.

Notary Public Signature

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

Notary Stamp

IDHR Form #6
Rev. 05/15

CHARGE OF DISCRIMINATION	AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form. # ☒ IDHR ☐ EEOC		

Illinois Department of Human Rights and EEOC

NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)
Ms. Suzette Robinson		[redacted]
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**DATE OF BIRTH**
[redacted]	Evanston, Illinois 60202	[redacted]

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)

NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code)
Jennifer Lin		847-448-4311
STREET ADDRESS	**CITY, STATE, ZIP CODE**	**COUNTY**
2100 Ridge Avenue	Evanston, Illinois 60201	Cook

CAUSE OF DISCRIMINATION BASED ON:	DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)
Retaliation	April 21, 2015 to August 21, 2015 ☐ CONTINUING ACTION

S E E A T T A C H E D

Dept. of Human Rights
SWITCHBOARD
SEP 16 2015
RECEIVED
By:

Page 1 of 3

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 16th DAY OF September, 2015.

Blair M. Henderson
NOTARY SIGNATURE

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

NOTARY STAMP

X [signature] 9-16-15
SIGNATURE OF COMPLAINANT DATE

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief

I. A. ISSUE/BASIS

Retaliation – April 21, 2015 to August 21, 2015

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connection with Mr. Bobkiewicz's conduct towards me. That Charge was assigned Charge Number 2015 CF 2974, and remains pending with the IDHR.

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13. On information and belief, at Mr. Farrar's direction, Ms. Lin undertook to interview multiple employees to dig up dirt on me. Not one of these employees had approached Ms. Lin voluntarily to lodge complaints about me. Rather, they were called in by Ms. Lin and interrogated. Many of those employees were observed leaving their interviews with Ms. Lin in tears. Ms. Lin reportedly dismissed as irrelevant any positive remarks made about me in those interviews.

14. Mr. Farrar and Ms. Lin did not follow established City procedures for the investigation of healthy work environment complaints in connection with these alleged complaints against me.

15. Ms. Lin documented her interviews in a memorandum to Assistant City Manager Martin Lyons and Mr. Farrar dated May 8, 2015. Without the benefit of speaking to me about any of the allegations allegedly made during her interviews, Ms. Lin concluded that I had created an unhealthy work environment. Furthermore, Ms. Lin concluded that this alleged unhealthy work environment was "immediate," even though the most recent specific incident described was over 6 months old and some incidents were at least 8 years old.

16. Contrary to established City policy and procedure, I was never informed of the results or recommendations made with respect to these alleged healthy work environment complaints.

17. Ms. Lin conducted these interviews in retaliation for my complaints against Mr. Bobkiewicz, for my stated intention of filing a charge of discrimination, and in retaliation for my filing Charge of Discrimination Number 2015 CF 2974 with the IDHR. In fact, the City submitted Ms. Lin's memorandum in response to my charge of discrimination in an effort to force me to withdraw that charge.

STATE OF ILLINOIS
ILLINOIS DEPARTMENT OF HUMAN RIGHTS

CHICAGO OFFICE
DEPARTMENT OF HUMAN RIGHTS
100 W RANDOLPH ST., SUITE 10-100
CHICAGO, ILLINOIS 60601
(312) 814-6200
(866) 740-3953 (TTY)

SPRINGFIELD OFFICE
DEPARTMENT OF HUMAN RIGHTS
222 S. COLLEGE ST., ROOM 101
SPRINGFIELD, ILLINOIS, 62704
(217) 785-5100
(866) 740-3953 (TTY)

CHARGE NO: _____

CHARGE OF DISCRMINIATION

COMPLAINANT

Name Suzette Robinson
Addre[redacted]
City, State ZIP Evanston, IL 60202
[redacted]

I believe that I have been personally aggrieved by a civil rights violation committed on

(date/s of harm): April 21, 2015 to August 21, 2015 **, by:**

RESPONDENT

Name Jennifer Lin
Address 2100 Ridge Avenue
County Cook
City, State ZIP Evanston, IL 60201
Telephone Number 847-448-4311

Dept. of Human Rights
SWITCHBOARD
SEP 16 2015
RECEIVED
By:

SEE ATTACHED

I, Suzette Robinson on oath or affirmation state that I am Complainant herein, that I have read the foregoing charge and know the contents thereof, and that the same is true and correct to the best of my knowledge.

9-16-15
Complainant's Signature and Date

Subscribed and Sworn to

Before me this 16th **day**

of September **,** 2015.

Notary Public Signature

OFFICIAL SEAL
BLAIR M HENDERSON
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:11/24/16

Notary Stamp

IDHR Form #6
Rev. 05/15

EXHIBIT B

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF:

SUZETTE ROBINSON,

COMPLAINANT,

AND

CITY OF EVANSTON,

RESPONDENT.

CHARGE NO. 2015CF2974
EEOC NO. 21BA51466

NOTICE OF DISMISSAL
FOR LACK OF SUBSTANTIAL EVIDENCE

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

William B. Oberts
Tribler, Orpett & Meyer, PC
225 W. Washington St.
Suite 1300
Chicago, IL 60606

DATE OF DISMISSAL: March 1, 2016

1. YOU ARE HEREBY NOTIFIED that based upon the enclosed investigation report, the DEPARTMENT OF HUMAN RIGHTS (DHR) has determined that there is NOT substantial evidence to support the allegations of the charge(s). Accordingly, pursuant to Section 7A-102(D) of the Human Rights Act (775 ILCS 5/1-101 et. seq.) and its Rules and Regulations (56 Ill. Adm. Code. Chapter II, Section 2520.560), the charge is HEREBY DISMISSED.

2. If Complainant disagrees with this action, Complainant may:

   a) Seek review of this dismissal before the Illinois Human Rights Commission, 100 West Randolph Street, Suite 5-100, Chicago, Illinois, 60601, by filing a "Request for Review" with the Commission by the request for review filing date below. Respondent will be notified by the Human Rights Commission if a Request for Review is filed.

   REQUEST FOR REVIEW FILING DEADLINE DATE: June 6, 2016

   Or,

   b) Commence a civil action in the appropriate state circuit court within ninety (90) days after receipt of this Notice. A complaint should be filed in the circuit court in the county where the civil rights violation was allegedly committed.

If you intend to exhaust your State remedies, please notify the Equal Employment Opportunity Commission (EEOC) immediately. The EEOC generally adopts the Department's findings. The Appellate Courts in Watkins v. Office of the State Public Defender, ___ Ill.App.3d ____, 976 N.E.2d 387 (1st Dist. 2012) and Lynch v. Department of Transportation, ___ Ill.App.3d ___, 979 N.E.2d 113 (4th Dist. 2012), have held that discrimination complaints brought under the Illinois Human Rights Act ("IHRA") against the State of Illinois **in the Illinois Circuit Court** are barred by the State Lawsuit Immunity Act. (745 ILCS 5/1 et seq.). Complainants are encouraged to consult with an attorney prior to commencing a civil action in the Circuit Court against the State of Illinois.

Please note that the Department cannot provide any legal advice or assistance. Please contact legal counsel, your city clerk, or your county clerk with any questions.

3. Complainant is hereby notified that the charge(s) will be dismissed with prejudice and with no right to further proceed if a timely request for review is not filed with the Commission, or a written complaint with the appropriate circuit court.

4. If an EEOC charge number is cited above, this charge was also filed with the Equal Employment Opportunity Commission (EEOC). If this charge alleges a violation under Title VII of the Civil Rights Act of 1964, as amended, or the Age Discrimination in Employment Act of 1967, Complainant has the right to request EEOC to perform a Substantial Weight Review of this dismissal. Please note that in order to receive such a review, it must be requested in writing to EEOC within fifteen (15) days of the receipt of this notice, or if a request for review is filed with the Human Rights Commission, within fifteen days of the Human Rights Commission's final order. Any request filed prior to your receipt of a final notice WILL NOT BE HONORED. Send your request for a Substantial Weight Review to EEOC, 500 West Madison Street, Suite 2000, Chicago, Illinois 60661. Otherwise, EEOC will generally adopt the Department of Human Rights' action in this case.

PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN APPPOINTMENT IS REQUIRED, CALL 312-869-8000 OR 1-800-669-4000.

DEPARTMENT OF HUMAN RIGHTS

HB1509/HB59
NOD/LSE
12/10

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

FILE NO (S) 2015CF2974

AFFIDAVIT OF SERVICE

Benetta M. Davies, deposes and states that she served a copy of the attached **NOTICE OF DISMISSAL FOR LACK OF SUBSTANTIAL EVIDENCE** on each person named below by depositing same this 1st day of March, 2016, in the U.S. Mail Box at 100 West Randolph Street, Chicago, Illinois, properly posted for FIRST CLASS MAIL, addresses as follows:

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

William B. Oberts
Tribler, Orpett & Meyer, PC
225 W. Washington St.
Suite 1300
Chicago, IL 60606

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Benetta M. Davies

PLEASE NOTE:

The above-signed person is responsible only for mailing these documents. If you wish a review of the findings in this case you must complete the Request for Review form attached. Department staff are not permitted to discuss the investigation findings once a Notice of Dismissal has been issued.

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF:

SUZETTE ROBINSON,

COMPLAINANT,

AND

JENNIFER LIN,

RESPONDENT.

CHARGE NO. 2016CN0552
EEOC NO. N/A

NOTICE OF DISMISSAL
FOR LACK OF JURISDICTION

Cynthia H. Hyndman
Robinson Curley & Clayton
Attorney at Law
300 South Wacker Drive
Suite 1700
Chicago, IL 60606

Joseph J. Perkoski
Robbins Schwartz Nicholas Lifton
Attorneys at Law
55 West Monroe Street, Suite 800
Chicago, IL 60603

DATE OF DISMISSAL: **April 12, 2016**

1. YOU ARE HEREBY NOTIFIED that based upon the enclosed investigation report, the DEPARTMENT OF HUMAN RIGHTS (DHR) has determined that there is NOT jurisdiction to pursue the allegations of the charge. Accordingly, pursuant to Section 7A-102(D) of the Human Rights Act, Illinois Compiled Statutes, (775 ILCS 5/3-101 et. seq.) and the Rules and Regulations of the DHR (56 Ill. Adm. Code. Chapter II, Section 2520.560), the charge is HEREBY DISMISSED.

2. If Complainant disagrees with this action, Complainant may:

a) seek review of this dismissal before the Illinois Human Rights Commission, 100 West Randolph Street, Suite 5-100, Chicago, Illinois, 60601, by filing a "Request for Review" with the Commission by the request for review filing date below. Respondent will be notified by the Human Rights Commission if a Request for Review is filed.

REQUEST FOR REVIEW FILING DEADLINE DATE: July 18, 2016

NOTICE OF DISMISSAL FOR LACK OF JURISDICTION
2016CN0552

Or,

b) commence a civil action in the appropriate state circuit court within ninety (90) days after receipt of this Notice. A complaint should be filed in the circuit court in the county where the civil rights violation was allegedly committed. **If you intend to exhaust your State remedies, please notify the Equal Employment Opportunity Commission (EEOC) immediately. The EEOC generally adopts the Department's findings.** The Appellate Courts in Watkins v. Office of the State Public Defender, ___ Ill.App.3d ____, 976 N.E.2d 387 (1st Dist. 2012) and Lynch v. Department of Transportation, ___ Ill.App.3d ___, 979 N.E.2d 113 (4th Dist. 2012), have held that discrimination complaints brought under the Illinois Human Rights Act ("IHRA") against the State of Illinois in the Illinois Circuit Court are barred by the State Lawsuit Immunity Act. (745 ILCS 5/1 et seq.). Complainants are encouraged to consult with an attorney prior to commencing a civil action in the Circuit Court against the State of Illinois.

Please note that the Department cannot provide any legal advice or assistance. Please contact legal counsel, your city clerk, or your county clerk with any questions.

3. If an EEOC charge number is cited above, this charge was also filed with the Equal Employment Opportunity Commission (EEOC). If this charge alleges a violation under Title VII of the Civil Rights Act of 1964, as amended, or the Age Discrimination in Employment Act of 1967, Complainant has the right to request EEOC to perform a Substantial Weight Review of this dismissal. Please note that in order to receive such a review, it must be requested in writing to EEOC within fifteen (15) days of the receipt of this notice, or if a request for review is filed with the Human Rights Commission, within fifteen days of the Human Rights Commission's final order. Any request filed prior to your receipt of a final notice WILL NOT BE HONORED. Send your request for a Substantial Weight Review to EEOC, 500 West Madison Street, Suite 2000, Chicago, Illinois 60661. Otherwise, EEOC will generally adopt the Department of Human Rights' action in this case.

PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN APPPOINTMENT IS REQUIRED, CALL 312-869-8000 OR 1-800-669-4000.

DEPARTMENT OF HUMAN RIGHTS

HB 1509/HB59/NOD/LOJ
7/13

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

FILE NO (S) 2016CN0552

AFFIDAVIT OF SERVICE

Gloria J. Polk, deposes and states that she served a copy of the attached **NOTICE OF DISMISSAL FOR LACK OF JURISDICTION** on each person named below by depositing same this 12th day of April, 2016, in the U.S. Mail Box at 100 West Randolph Street, Chicago, Illinois, properly posted for FIRST CLASS MAIL, addresses as follows:

Cynthia H. Hyndman
Robinson Curley & Clayton
Attorney at Law
300 South Wacker Drive
Suite 1700
Chicago, IL 60606

Joseph J. Perkoski
Robbins Schwartz Nicholas Lifton
Attorneys at Law
55 West Monroe Street, Suite 800
Chicago, IL 60603

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Gloria J. Polk

PLEASE NOTE:

The above-signed person is responsible only for mailing these documents. If you wish a review of the findings in this case you must complete the Request for Review form attached. Department staff are not permitted to discuss the investigation findings once a Notice of Dismissal has been issued.

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF:

SUZETTE ROBINSON,

COMPLAINANT,

AND

W. GRANT FARRAR,

RESPONDENT.

CHARGE NO. 2016CN0553
EEOC NO. N/A

NOTICE OF DISMISSAL FOR LACK OF JURISDICTION

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

Joseph J. Perkoski
Robbins, Schwartz, Nicholas,
Lifton & Taylor, Ltd.
55 W. Monroe Street
Suite 800
Chicago, IL 60603

DATE OF DISMISSAL: April 26, 2016

1. YOU ARE HEREBY NOTIFIED that based upon the enclosed investigation report, the DEPARTMENT OF HUMAN RIGHTS (DHR) has determined that there is NOT jurisdiction to pursue the allegations of the charge. Accordingly, pursuant to Section 7A-102(D) of the Human Rights Act, Illinois Compiled Statutes, (775 ILCS 5/3-101 et. seq.) and the Rules and Regulations of the DHR (56 Ill. Adm. Code. Chapter II, Section 2520.560), the charge is HEREBY DISMISSED.

2. If Complainant disagrees with this action, Complainant may:

a) seek review of this dismissal before the Illinois Human Rights Commission, 100 West Randolph Street, Suite 5-100, Chicago, Illinois, 60601, by filing a "Request for Review" with the Commission by the request for review filing date below. Respondent will be notified by the Human Rights Commission if a Request for Review is filed.

REQUEST FOR REVIEW FILING DEADLINE DATE: **August 1, 2016**

Or,

b) commence a civil action in the appropriate state circuit court within ninety (90) days after receipt of this Notice. A complaint should be filed in the circuit court in the county where the civil rights violation was allegedly committed. **If you intend to exhaust your State remedies, please notify the Equal Employment Opportunity Commission (EEOC) immediately. The EEOC generally adopts the Department's findings.** The Appellate Courts in Watkins v. Office of the State Public Defender, ___ Ill.App.3d ____, 976 N.E.2d 387 (1st Dist. 2012) and Lynch v. Department of Transportation, ___ Ill.App.3d ___, 979 N.E.2d 113 (4th Dist. 2012), have held that discrimination complaints brought under the Illinois Human Rights Act ("IHRA") against the State of Illinois **in the Illinois Circuit Court** are barred by the State Lawsuit Immunity Act. (745 ILCS 5/1 et seq.). Complainants are encouraged to consult with an attorney prior to commencing a civil action in the Circuit Court against the State of Illinois.

Please note that the Department cannot provide any legal advice or assistance. Please contact legal counsel, your city clerk, or your county clerk with any questions.

3. If an EEOC charge number is cited above, this charge was also filed with the Equal Employment Opportunity Commission (EEOC). If this charge alleges a violation under Title VII of the Civil Rights Act of 1964, as amended, or the Age Discrimination in Employment Act of 1967, Complainant has the right to request EEOC to perform a Substantial Weight Review of this dismissal. Please note that in order to receive such a review, it must be requested in writing to EEOC within fifteen (15) days of the receipt of this notice, or if a request for review is filed with the Human Rights Commission, within fifteen days of the Human Rights Commission's final order. Any request filed prior to your receipt of a final notice WILL NOT BE HONORED. Send your request for a Substantial Weight Review to EEOC, 500 West Madison Street, Suite 2000, Chicago, Illinois 60661. Otherwise, EEOC will generally adopt the Department of Human Rights' action in this case.

PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN APPPOINTMENT IS REQUIRED, CALL 312-869-8000 OR 1-800-669-4000.

DEPARTMENT OF HUMAN RIGHTS

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

FILE NO (S) 2016CN0553

AFFIDAVIT OF SERVICE

Benetta M. Davies, deposes and states that she served a copy of the attached **NOTICE OF DISMISSAL FOR LACK OF JURISDICTION** on each person named below by depositing same this 26th day of April, 2016, in the U.S. Mail Box at 100 West Randolph Street, Chicago, Illinois, properly posted for FIRST CLASS MAIL, addresses as follows:

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

Joseph J. Perkoski
Robbins, Schwartz, Nicholas,
Lifton & Taylor, Ltd.
55 W. Monroe Street
Suite 800
Chicago, IL 60603

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Benetta M. Davies

PLEASE NOTE:

The above-signed person is responsible only for mailing these documents. If you wish a review of the findings in this case you must complete the Request for Review form attached. Department staff are not permitted to discuss the investigation findings once a Notice of Dismissal has been issued.

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF:

SUZETTE ROBINSON,

COMPLAINANT,

AND

WALTER BOBKIEWICZ,

RESPONDENT.

CHARGE NO. 2016CN0551
EEOC NO. N/A

NOTICE OF DISMISSAL
FOR LACK OF JURISDICTION

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

Walter Bobkiewicz
2100 Ridge Ave.
Evanston, IL 60201

DATE OF DISMISSAL: April 27, 2016

1. YOU ARE HEREBY NOTIFIED that based upon the enclosed investigation report, the DEPARTMENT OF HUMAN RIGHTS (DHR) has determined that there is NOT jurisdiction to pursue the allegations of the charge. Accordingly, pursuant to Section 7A-102(D) of the Human Rights Act, Illinois Compiled Statutes, (775 ILCS 5/3-101 et. seq.) and the Rules and Regulations of the DHR (56 Ill. Adm. Code. Chapter II, Section 2520.560), the charge is HEREBY DISMISSED.

2. If Complainant disagrees with this action, Complainant may:

a) seek review of this dismissal before the Illinois Human Rights Commission, 100 West Randolph Street, Suite 5-100, Chicago, Illinois, 60601, by filing a "Request for Review" with the Commission by the request for review filing date below. Respondent will be notified by the Human Rights Commission if a Request for Review is filed.

REQUEST FOR REVIEW FILING DEADLINE DATE: **August 1, 2016**

Or,

b) commence a civil action in the appropriate state circuit court within ninety (90) days after receipt of this Notice. A complaint should be filed in the circuit court in the county where the civil rights violation was allegedly committed. **If you intend to exhaust your State remedies, please notify the Equal Employment Opportunity Commission (EEOC) immediately. The EEOC generally adopts the Department's findings.** The Appellate Courts in Watkins v. Office of the State Public Defender, ___ Ill.App.3d ____, 976 N.E.2d 387 (1st Dist. 2012) and Lynch v. Department of Transportation, ___ Ill.App.3d ___, 979 N.E.2d 113 (4th Dist. 2012), have held that discrimination complaints brought under the Illinois Human Rights Act ("IHRA") against the State of Illinois **in the Illinois Circuit Court** are barred by the State Lawsuit Immunity Act. (745 ILCS 5/1 et seq.). Complainants are encouraged to consult with an attorney prior to commencing a civil action in the Circuit Court against the State of Illinois.

Please note that the Department cannot provide any legal advice or assistance. Please contact legal counsel, your city clerk, or your county clerk with any questions.

3. If an EEOC charge number is cited above, this charge was also filed with the Equal Employment Opportunity Commission (EEOC). If this charge alleges a violation under Title VII of the Civil Rights Act of 1964, as amended, or the Age Discrimination in Employment Act of 1967, Complainant has the right to request EEOC to perform a Substantial Weight Review of this dismissal. Please note that in order to receive such a review, it must be requested in writing to EEOC within fifteen (15) days of the receipt of this notice, or if a request for review is filed with the Human Rights Commission, within fifteen days of the Human Rights Commission's final order. Any request filed prior to your receipt of a final notice WILL NOT BE HONORED. Send your request for a Substantial Weight Review to EEOC, 500 West Madison Street, Suite 2000, Chicago, Illinois 60661. Otherwise, EEOC will generally adopt the Department of Human Rights' action in this case.

PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN APPPOINTMENT IS REQUIRED, CALL 312-869-8000 OR 1-800-669-4000.

DEPARTMENT OF HUMAN RIGHTS

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

FILE NO (S) 2016CN0551

AFFIDAVIT OF SERVICE

Benetta M. Davies, deposes and states that she served a copy of the attached **NOTICE OF DISMISSAL FOR LACK OF JURISDICTION** on each person named below by depositing same this 27th day of April, 2016, in the U.S. Mail Box at 100 West Randolph Street, Chicago, Illinois, properly posted for FIRST CLASS MAIL, addresses as follows:

Cynthia H. Hyndman
Robinson, Curley & Clayton, PC
300 S. Wacker Drive
Suite 1700
Chicago, IL 60606

Walter Bobkiewicz
2100 Ridge Ave.
Evanston, IL 60201

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Benetta M. Davies

PLEASE NOTE:

The above-signed person is responsible only for mailing these documents. If you wish a review of the findings in this case you must complete the Request for Review form attached. Department staff are not permitted to discuss the investigation findings once a Notice of Dismissal has been issued.